

APR 11 - 5 P 10 02

CLERK OF COURT

AMENDED COMPLAINT

(for non-prisoner filers without lawyers)

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

(Full name of plaintiff(s))

Danielle M Valoe

v.

Case Number:

22cv182

(to be supplied by Clerk of Court)

(Full name of defendant(s))

Allstate Insurance

Company's Allstate
Property and Casualty
Insurance Company

A. PARTIES

1. Plaintiff is a citizen of Wisconsin and resides at
(State)

4255 N 89th St Milwaukee WI 53222
(Address)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant Allstate Insurance Company
Allstate Property and Casualty (Name)
Insurance Company

is (if a person or private corporation) a citizen of Illinois
(State, if known)

and (if a person) resides at _____
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for Allstate Property and Casualty Insurance Company & Allstate Insurance Company (Employer's name and address, if known)
See below

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

Allstate Insurance company Claims Service Leader
PO Box 660636 Dallas Texas 75266 Kristina Mallek
Allstate Insurance Company Julie Parsons Executive
Vicepresident 3100 Sanders Rd # 201 Northbrook IL 60062
Allstate Insurance Company John Charles Pintozi
Title Controller 3100 Sanders Rd # 201 Northbrook IL 60062
Legal Name for Allstate Property & Casualty Insurance
Company: Encompass Home & Auto Insurance Company
3100 Sanders Rd # 64E Northbrook IL 60062 Adjuster
Jonathan Paul

Statement of Claim

1. Who Violated my rights 2. What they did
Danielle M Value plaintiff filing pro-se an
amended Complaint for Case no. 22-cv-182-pp
Filed in February 2022. Allstate Insurance
Company and its other known entity
Allstate Property and Casualty Insurance
Company engaged in debt collecting behavior
intentionally causing harm to thier
Consumer Value. Defendants broke thier
promise to Value in regards to Claim
0578600421 for loss on 2/17/2020
against her policy issued by Allstate
Property & Casualty Insurance Company
for a uninsured mortorist Claim. Adjuster
Jonathan Paul closed out her claim Sending
Value her payment set at policy limits
for \$50,000. Value agreed to this Settlement
amount asking that Benefit Recovery not be
added to her Check sho was demanding

Full payment. Mr Paul negotiated benefits Recovery lien and made Valoe agree to a said amount \$1.00 before sending out her payment. Valoe's ~~claim~~^{claim} was closed on March 5th 2021 with Valoe telling Mr Paul her exact intentions she was demanding her payment. Valoe states that her binding contract was complete when she signed her check and cashed it. Julie Parsons & John C pintozi signed off on her payment. What happened after this agreement impacted Valoe's life functions including work. Valoe states there is no good reason outside of retaliation as to why Allstate would use thier credentials to request a check back without Valoe's permission. Valoe was fully capable back then to payoff the lien in full on her own accord. § Valoe states she was in contact with the medical lien holder who stated

they would accept a lower amount. Valoe offered the lien holder \$1.00 Sent an additional email to the lien holder waiting for thier response. to see if that amount was ok. Valoe states she had the email address from a prior lien that she paid in full through another claim. Valoe provided evidence to this court that Adjuster Paul ordered Valoes check back from her bank account without her permission and that her account was treated as fraud. Not from obtaining a signature but because Allstate demanded the payment back. The defendants already didnt calculate Valoes missed wages and her commission Valoe had every right to act as her own lawyer. On June 3rd 2021 Valoe reached out to Kristina Mallek asking where payment was on her closed case from March 5th 2021. Bmo Harriss Bank stated they sent back payable to Allstate and reach out to Adjuster Paul

The Check that was Made payable to Allstate From Bmo was for \$50,000. Valbe sent Mr Paul an email wondering where her payment was. Kristina responded with a lower amount telling Valbe that they are Sending full lien amount to Benefit Recovery Valbe states there was no need to have her Check sent back to Allstate. Defendants unlawful conduct has resulted in considerable harm to Valbe's mental health causing her to loose her good paying job at Waste Management. Allstate obtained money from my account with Bmo Hariss using false pretenses, Valbe States that she sent Darius Moore the rep for Benefit Recovery group another fax to make sure \$1.00 was OK before sending Benefit Recovery group the payment Valbe was willing to send. Valbe states that for the last few years she has been under the care of professionals. Valbe was diagnosis

with PTSD for false allegations on April 17th 2001. Valoe states these are allegations made by the defendants. It's unclear why Allstate would be in contact with the Department of Corrections in regards to Valoe's payment. Valoe states that she was forced to keep and buy Automobile insurance while on probation or that was a violation of her probation. Tony Ignoffo a BMO rep was working with Valoe in regards to this payment and said a simple letter from Allstate would get the funds released. Valoe now is seeing it's Mr Paul and his credentials that he had from Allstate that made her account go to the fraud department and request it back. Valoe has not received confirmation through a letter of guarantee that the lien was paid only a email from Kristina Mallek Allstate Insurance Company from

Dallas TX with the logo attached Good Work. Good Life. Good hands. Valoe's money was taken she was not in good hands. Valoe states she did file a complaint with the Wisconsin Office of the Commissioner of Insurance. Valoe states she did not get her April 12th 2021 letter from Allstate until late June. It's unclear if Allstate used its credentials from getting that letter sooner. Allstate the defendants were informed of her talks with the lien holder. Valoe states her bank could of issued her a 2 party check for the lien amount. Valoe told the bank rep to call Allstate. It was Allstate who demanded Valoe's check back. Allstate is a Foreign profit Corporation doing business in 49 States and Canada. It's incorporation state is in Illinois. Valoe states taking her money has caused harm at one point Valoe states she could not

write without anxiety. It's unclear who in Allstate would of spoken to her probation officer. Valoe states she never would of accepted a check and cashed it if the check wasn't hers. Valoe signed an affidavit with BMO claiming on to those funds. Allstate treated Valoe unfairly and she has suffered from this. Valoe was told by Allstate once they got her probation officer involved her rights to her payment was taken. Allstate used thier credentials demanding my check be sent to them. Valoe does not know why Adjuster Paul did this. Valoe was informed by his supervisor that when she did make a complaint it went on Paul's record.

C. JURISDICTION



I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR



I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is

\$ _____.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

Value is seeking \$300 million in damages. Value feels that is a good amount for all the pain Allstate caused. Value kept receiving small checks from Allstate as she was being tayed with. It's like Allstate used the police to get money out my account and then laughed at her by sending her small checks. Value is requesting that her check as a demand be direct deposited. She wants a jury trial.

E. JURY DEMAND

I want a jury to hear my case.

☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 5th day of April 2024.

Respectfully Submitted,

Danielle Valoe

Signature of Plaintiff

414-526-5647

Plaintiff's Telephone Number

Plaintiff's Email Address

ClO Kendall Champion 4255 N 89th St

Milwaukee WI 53222

(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)